

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

GLORIA ALEXANDER, individually and/or on behalf of all others similarly situated,

Plaintiffs,

vs.

SAFEGUARD OPERATIONS LLC; and SAFEGUARD STORAGE PROPERTIES, LLC d.b.a. SAFEGUARD SELF STORAGE,

Defendants.

Case No. 1:13-cv-6061 (AMD)(RLM)

**NOTICE OF PLAINTIFFS'
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF
CLASS SETTLEMENT,
PROVISIONAL CERTIFICATION OF
THE SETTLEMENT CLASS,
APPOINTMENT OF CLASS COUNSEL
AND APPROVAL OF NOTICE OF
SETTLEMENT**

PLEASE TAKE NOTICE THAT:

Plaintiffs hereby move this Court, The Honorable Judge Ann M. Donnelly, United States District Court for the Eastern District of New York, to: (1) preliminarily approve the settlement memorialized in the Joint Stipulation and Settlement Agreement between Plaintiffs Gloria Alexander, Cheryl Whitfield, Angelo Kelly, Elisa Phillips, and Marisol Aviles (together “Plaintiffs”) and Defendants Safeguard Operations LLC, Safeguard Storage Properties, LLC, d.b.a. Safeguard Self Storage (together “Defendants” or “Safeguard”) attached as Exhibit 1 to the Declaration of Christopher Q. Davis submitted in Support of Plaintiffs’ Motion for Preliminary Approval of Class Settlement, Provisional Certification of the Settlement Class, Appointment of Class Counsel, and Approval of Notice of Settlement (“Motion for Preliminary Approval”); (2) provisionally certify the proposed settlement class under Federal Rule of Civil Procedure 23(b)(3) and Section 29 U.S.C. § 216(b) for settlement purposes only; (3) appoint Christopher Q. Davis as Class Counsel (“Class Counsel”); and (4) approve the Notice of Proposed Class Action

Lawsuit Settlement and Final Fairness Hearing (“Class Notice”) and Consent to Join Claim Form and Release (“Claim Form”), attached as Exhibits A and B to the Settlement Agreement.

In support of this Motion, the Parties rely on the pleadings and documents filed in this action, the Declaration of Christopher Q. Davis, and Plaintiffs’ Memorandum of Law in support of this Motion, filed simultaneously herewith.

In addition to the pleadings and documents filed herewith, Plaintiffs will also rely on the entire record in this action, such further pleadings and documents as may be filed, and oral argument as the Court may permit or require.

Plaintiffs have contemporaneously submitted a Proposed Order, attached hereto as Exhibit 1.

Dated: November 30, 2015
New York, New York

THE LAW OFFICE OF CHRISTOPHER Q.
DAVIS, PLLC

By: _____/s/_____

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Attorneys for Plaintiffs